201-15801

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WRITER'S DIRECT ACCESS

Thomas C. Berger
(202) 434-4285
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March 26, 2003

Via Courier

Mr. Charles M. Auer
Director, Chemical Control Division
U.S. Environmental Protection Agency (7407M)
1201 Constitution Avenue, N.W.
Room 6428
Washington, D.C. 20460

Re: EPA High Production Volume Challenge Program, Status of "Aluminum Rosinate" (CASRN 61789-65-9)

Dear Mr. Auer:

We are writing regarding the status of *Resin acids and Rosin acids, aluminum salts* (aluminum rosinate), with Chemical Abstracts Service Registry Number (CASRN) 61789-65-9, under the Environmental Protection Agency's (EPA's) High Production Volume (HPV) Challenge Program. More specifically, we are following up on our letter to you dated November 24, 1999 (copy enclosed), which requested that aluminum rosinate be eliminated from consideration for testing under the HPV Challenge Program based on the fact that this substance is not required to be reported for Inventory Update Reporting (IUR).

As we noted in our letter, based on information obtained from EPA, and having contacted each of the manufacturers that reported this substance for the Toxic Substances Control Act (TSCA) IUR rule in 1990, 1994, and 1998, it appears that none of the production of this substance was required to be reported for the IUR in these years. The only reason this substance appears on the HPV list is because it was reported for the IUR when it was not required to be reported. Accordingly, not only is this substance "no longer HPV," this substance was never HPV nor, due to the way in which it is manufactured, is there any expectation that it will ever be HPV. We therefore respectfully request that this substance be removed from consideration for testing under the HPV program.

Having not received a response to our letter, we thought we would write to the Agency to inquire as to the status of this matter. Thank you for your attention. Should you have any questions, or if we can provide any additional information, please do not hesitate to contact us.

Sincerely,

Thomas C. Berger

Enclosure

HR2W1-11T

RECEIVED 11/30/99

LAW OFFICES

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WRITER'S DIRECT ACCESS

November 24, 1999

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Mr. Charles M. Auer
Director, Chemical Control Division
U.S. Environmental Protection Agency
Mail Code 7407
401 M Street, S.W.
Washington, DC 20460

Re: EPA High Production Volume Challenge Program, Status of "Aluminum Rosinate" (CASRN 61789-65-9)

Dear Mr. Auer:

We are writing regarding the status of "*resin acids and rosin acids, aluminum salts,*" Chemical Abstracts Service Registry Number (CASRN) 61789-65-9 under EPA's High Production Volume (HPV) Challenge Program. For purposes of brevity, this substance is referred to throughout this letter as "aluminum rosinate."

In particular, we are writing to request that aluminum rosinate be eliminated from consideration for testing under the HPV Challenge Program. Based on information obtained from EPA's Office of Prevention, Pesticides, and Toxic Substances (OPPTS), and having contacted each of the manufacturers that reported this substance for the Toxic Substances Control Act (TSCA) Inventory Update Reporting (IUR) rule in 1990, 1994 and 1998, it appears that none of the production of this substance was required to be reported for the IUR in these years. We also have no reason to believe that any of this substance will be reportable for subsequent IUR reporting periods. Accordingly, this substance does not meet EPA's listing criteria for the HPV and should be removed from the list of substances for which test data is requested under the HPV program.

I. Aluminum Rosinate

As discussed in greater detail below, aluminum rosinate is almost exclusively "manufactured" in the U.S. in the Kraft papermaking process. In this process, alum (aluminum sulfate) is typically added to a "blend chest," which is a process vessel in which paper pulp is first made into a slurry. Rosins are added to the pulp slurry at the next chest in the process where the alum and rosin are able to react. The pulp/alum/rosin slurry is then carried on to high-speed wire screens, where the slurry is dewatered, pressed, and dried into paperstock.

Alum and rosin are added to "size" paper, that is, to facilitate formation of paper that is smooth and that has suitable structural integrity. More specifically, these substances put a hydrophobic coating on the paper to provide suitable water/ink holdout. Various rosins are used for this purpose, and the particular chemical identity of the aluminum rosinate is not critical. The industry uses *"resin acids and rosin acids, aluminum salts"* (CASRN 61789-65-9) to describe this substance. This substance is listed on the TSCA Inventory.

II. TSCA IUR Reporting For Aluminum Rosinate

A. EPA Position

On January 26, 1999, we submitted a written request to EPA for an interpretation as to whether aluminum rosinate so formed is subject to TSCA IUR reporting (Attachment 1). We suggested, *inter alia*, that this substance could be exempt from reporting under 40 C.F.R. § 710.4(d)(5), as a substance that results upon end use of alum and rosin in the preparation of a slurry of paper fibers in the manufacture of paper and that is neither manufactured for distribution in commerce, *per se*, nor used as an intermediate. On August 18, 1999, EPA responded to our request and indicated that this substance was exempt from IUR reporting under 40 C.F.R. § 720.30(h)(5) (Attachment 2).[1/] Accordingly, ***no aluminum rosinate produced in the papermaking process should have been reported for the IUR.***

B. IUR Reports

On January 25, 1999 and September 20, 1999 we submitted requests under the Freedom of Information Act (FOIA) for the names, addresses, and other contact information regarding the companies that reported this substance for the 1990, 1994, and 1998 IUR and for the amounts reported under the IUR as manufactured or imported by each company in each year. We also

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1/ 40 C.F.R. § 720.30(h)(5) appears in the TSCA PMN rules at Part 720 and is the counterpart to 40 C.F.R. § 710.4(d)(5), which appears in the TSCA IUR rule. Substances covered by section 720.30(h)(5) are exempt from IUR. *See* 40 C.F.R. § 710.30(c) (exempting substances manufactured as described in 40 C.F.R. § 720.30(h) from IUR).

requested the number, if any, of companies who claimed their identities as TSCA confidential business information (CBI) in their IUR reports in each year. The purpose of our requests was to determine the extent to which the aluminum rosinate reported for the IUR in these years was not required to be reported for the IUR.

The responses to our FOIA requests (Attachment 3) were as follows. For the 1990 IUR, all 14 sites reporting this substance were paper manufacturers (James River, Gaylord sites). In 1994, 9 of the 10 sites reporting this substance were paper manufacturing sites (James River, Gaylord sites). The single site reporting this substance that was not a paper manufacturing site was Daicolor-Pope, Inc., Paterson, New Jersey, whose production volume was claimed CBI. For the 1998 IUR, all 10 sites reporting this substance were paper manufacturers (Crown Paper, Crown Vantage, Fort James, Gaylord sites). The results of our FOIA requests for aluminum rosinate reported under the IUR are summarized in the following table.

IUR Reporting Year	Reporting of Aluminum Rosinate (CASRN 61789-65-9)	Paper Manufacturers	Non-Paper Manufacturers
1990	Number of Sites Reporting	14	0
1994	Number of Sites Reporting	9	1
1998	Number of Sites Reporting	10	0

III. Discussion

As noted above, EPA has clarified that aluminum rosinate produced in the papermaking process as described above is exempt from IUR. Thus, the 33 IUR reports submitted by James River, Crown, and Gaylord for the 1990, 1994, and 1999 reporting years were incorrect in that the aluminum rosinate reported as manufactured was not required to be reported for the IUR. If IUR reports were required for these sites due to the manufacture or import of other substances, the reports should not have referenced manufacture of aluminum rosinate. In other words, for these sites, the production volume of aluminum rosinate in the relevant reporting years was "0".

Further, we have learned that the aluminum rosinate manufactured by Daicolor-Pope is similarly manufactured *in situ* upon end use of an aluminum compound and rosin, but, in this case, in a pigment manufacturing process, in which it is intended to improve the dispersability of the pigment. The attached letter (Attachment 4) from Daicolor-Pope documents the manufacture of this substance, and also notes that it is no longer manufactured by Daicolor-Pope. Thus, it appears that the production volume of aluminum rosinate reported by Daicolor-Pope (which is claimed CBI) also may not have been reportable for the IUR, and, even if it was reportable, is no longer produced.

Based on the preceding, we believe that aluminum rosinate should not be considered an HPV substance. As noted above, EPA has indicated that aluminum rosinate produced in the papermaking process is exempt from IUR requirement under 40 C.F.R. § 720.30(h)(5) as a substance produced upon end-use of alum and rosin. Had amounts of this substance that were not required to be reported for the IUR not been reported, this substance would not have appeared on EPA's HPV list, *i.e.*, aluminum rosinate would not have been manufactured or imported in a quantity subject to TSCA IUR reporting that exceeded 1,000,000 pounds per year in any of the relevant reporting years. In other words, the only reason this substance appears on the HPV list is because it was reported for the IUR when it was not required to be reported. **Accordingly, not only is this substance "no longer HPV," this substance was *never* HPV nor, due to the way in which it is "manufactured," is there any expectation that it will *ever* be HPV.**

Under TSCA, substances such as aluminum rosinate that are covered by 40 C.F.R. § 720.30(h)(5) are deemed to be manufactured for "commercial purposes," but are not manufactured for distribution in commerce as chemical substances, *per se*, and have no commercial purpose separate from the substance, mixture, or article of which are a part. EPA should not expend resources and cause animals to be sacrificed in the pursuit of toxicity data on these types of substances. They are exempt from TSCA IUR and TSCA premanufacture notification (PMN) requirements, and, thus, should be exempt from HPV testing requirements.

Furthermore, based on the fact that aluminum rosinate is produced *in situ*, and in the case of paper manufacture, subsequently becomes part of an "article," *there is little or potential for exposure to this substance*. This substance should cannot reasonably be considered by EPA to be a priority substance for testing under this program.

In light of the preceding, we respectfully request that this substance be removed from consideration for testing under the HPV program.

* * *

We trust that this letter fully sets forth our position on this matter. Should you have any questions, or if we can provide any additional information, please do not hesitate to contact us.

Sincerely,

John B. Dubeck

Attachments

Attachment 1
Request to EPA for IUR Reportability Determination

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January 26, 1999

(202) 434-4125
dubeck@khlaw.com

VIA FACSIMILE

Mr. David E. Schutz
U.S. Environmental Protection Agency
Office of Prevention, Pesticides, and Toxic Substances
Chemical Control Division
Room E435S
Mail Code 7405
401 M Street, S.W.
Washington, D.C. 20460

Re: Reportability of Aluminum Rosinate Under TSCA Inventory Update Reporting Rule

Dear Mr. Schutz:

We are writing to request the Agency's written opinion regarding the reportability of *"resin acids and rosin acids, aluminum salts"* (CASRN 61789-65-9) ("aluminum rosinate") as formed during the paper making process for purposes of the Toxic Substances Control Act (TSCA) Inventory Update Reporting (IUR) rule.[1/] More specifically, we are requesting the Agency's opinion as to whether the use described below is exempt from IUR under 40 C.F.R. § 710.4(d)(7) or 40 C.F.R. § 710.4(d)(5).

I. Aluminum Rosinate

The use of the subject substance at issue is its role in the Kraft papermaking process. In this process, alum (aluminum sulfate) is added to a "blend chest," which is a process vessel in

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1/ For purposes of brevity, this substance is referred to in this letter as "aluminum rosinate."

which paper pulp is first made into a slurry. Rosins are added to the pulp slurry at the next chest in the process where the alum and rosin are able to react. The pulp/alum/rosin slurry is then carried on to high-speed wire screens, where the slurry is dewatered, pressed, and dried into paperstock.

Alum and rosin are added to "size" paper, that is, to facilitate formation of paper that is smooth and that has suitable structural integrity. More specifically, these substances put a hydrophobic coating on the paper to provide suitable water/ink holdout. Various rosins are used for this purpose, and the particular chemical identity of the aluminum rosinate is not critical. The industry uses *"resin acids and rosin acids, aluminum salts"* (CASRN 61789-65-9) to describe this substance. This substance is listed on the TSCA Inventory.

A. Applicability of the "(d)(7)" Exemption to Aluminum Rosinate

We are first requesting the Agency's opinion as to whether aluminum rosinate when formed and used as described above is exempt from IUR under 40 C.F.R. § 710.4(d)(7). The addition of alum to pulp is necessary to precipitate rosin onto the paper fibers.[2/] Thus, when manufactured as described above, aluminum rosinate is formed by a chemical reaction that involves the use of an agglomerating agent or flocculant (alum). Second, even though it improves the physical properties of the paper ultimately formed from the slurry, the aluminum rosinate does not provide the primary properties of the slurry (*i.e.*, its ability to form paper). Third, the aluminum rosinate clearly has no commercial purpose separate from the slurry and is not itself intended for distribution in commerce as a chemical substance, *per se*.

The status of the ingredients in the slurry is similar to the status of the components in ink formulations that EPA provides as classic examples of (d)(7). Inks are highly formulated products. Although many reactions occur during the formulation of ink products, to the extent that reactions occur during formulation rather than prior to formulation in a pre-blending step in which individual species are produced, (d)(7) should apply. Here, in our view, the primary property of the slurry is its ability to make paper. The aluminum rosinate is simply used to provide a secondary property to a formulation used to make a final commercial product that is distributed in commerce.

B. Applicability of the "(d)(5)" (End-Use) Exemption to Aluminum Rosinate

We are also requesting the Agency's opinion as to whether aluminum rosinate is exempt from IUR reporting as a chemical substance formed during the end-use of a chemical substance

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2/ *See Kirk-Othmer Encyclopedia of Chemical Technology,* Volume 16 (3rd ed. 1978) at 803-804, 808-811; Garlick, K., *A Brief Review of the History of Sizing and Resizing Practices, reprinted from* "Book and Paper Group Annual," Vol. 5 (1986).

under 40 C.F.R. § 710.4(d)(5). Therefore, aluminum rosinate results upon end use of alum and rosin in the preparation of a slurry of paper fibers in the manufacture of paper. The aluminum rosinate that results is neither manufactured for distribution in commerce, *per se*, nor is it used as an *intermediate* as that term is defined at § 710.2(n).

* * *

We thank you in advance for your assistance and look forward to your response. In the meantime, should you have any questions concerning this matter, please do not hesitate to contact us.

Sincerely,

John B. Dubeck

Attachment 2
EPA Response to Request for IUR Reportability Determination

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 18 1999

Mr. John B. Dubeck
Law Offices, Keller and Heckman
Suite 500 West
1001 G Street, North West
Washington, District of Columbia 20001

PC 3716

Dear Mr Dubeck:

This letter responds to your letter dated 26 January 1999, sent to Dave Schutz of my staff. In that letter, you describe the formation of aluminum rosinate ("resin acids and rosin acids, aluminum salts", CASRN 61789-65-9) in the blend chest of a papermaking operation. You describe the situation as follows: alum is added to pulp slurry in a process tank ("blend chest") in the papermaking process. After blending, the material is moved to another blend chest, where rosins are added and the alum and rosin can react. The pulp slurry containing aluminum rosinate is then carried onto wire screens, where the material is dewatered and made into paper.

You ask whether a person is required to report this material under the Inventory Update Rule ("IUR") at 40 Code of Federal Regulations ("CFR") §710.28, and specifically if it is exempted from IUR under 40 CFR §710.4(d)(7) or §710.4(d)(5). Actually, the IUR at 40 CFR §710.28 excludes persons manufacturing substances which are excluded from premanufacture notice ("PMN") requirements at 40 CFR §§720.30(g) (byproducts) or (h) (substances without separate commercial intent, including at (h)(7) those formed when a flocculant acts as intended and at (h)(5) those formed during end use of a chemical substance) from the requirement to report under the IUR. As the material is not a byproduct, 40 CFR §720.30(h) is the section to consider in determining whether aluminum rosinate is excluded from the IUR requirement at 40 CFR §710.28.

Though alum is a flocculant, the aluminum rosinate formed from alum and rosin is not itself a flocculant in any ordinary

CONTAINS NO CBI

sense of the term. Its synthesis is intentional, and it has a desired function in the final product paper. Thus the Agency has determined that the exemption at §720.30(h)(7) is not applicable to aluminum rosinate under the conditions you have described.

The Agency agrees, however, that 40 CFR §720.30(h)(5), which excludes any chemical substance which is the result of a reaction that may occur upon end use of other chemical substances, mixtures, or articles, and which is not itself manufactured or imported for distribution in commerce or for use as an intermediate, is applicable to aluminum rosinate which forms in a paper blend tank in the manner described above. Since the (h)(5) exemption is applicable, your client need not report the aluminum rosinate under the Inventory Update Rule.

Please feel free to call Mr. David Schutz of my staff on 202-260-8994 with any question on this matter.

Sincerely,

Rebecca S. Cool, Chief
New Chemicals Prenotice Branch (7405)

Attachment 3
EPA Responses to FOIA Requests for IUR Report Information

U.S. ENVIRONMENTAL PROTECTION AGENCY
INFORMATION MANAGEMENT DIVISION
NONCONFIDENTIAL INFORMATION
CUS '90 CAS NUMBER REPORT

CAS NUMBER: 61789659
CHEMICAL NAME: Resin acids and Rosin acids, aluminum salts

UPDFORM: 60844059 LINE: 6 REPORT YEAR: 90
COMPANY: GAYLORD CONTAINER CORPORATION CBI COMP: N
SITE: GAYLORD CONTAINER-MILL DIV CBI PLANT: N
ADDRESS: 4TH ST P O BOX 1060 CBI CHEM:
CI/ST/ZP: BOGALUSA, LA 704271060
PRODVOL: 189,000 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60849767 LINE: 1 REPORT YEAR: 90
COMPANY: JAMES RIVER CORPORATION CBI COMP: N
SITE: JAMES RIVER-HUGHESVILLE MILL CBI PLANT: N
ADDRESS: CYPHERS RD CBI CHEM:
CI/ST/ZP: HOLLAND TOWNSHIP, NJ 0
PRODVOL: 197,400 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60846201 LINE: 1 REPORT YEAR: 90
COMPANY: JAMES RIVER CORPORATION CBI COMP: N
SITE: JAMES RIVER-WARREN GLEN MILL CBI PLANT: N
ADDRESS: RTES 519 & 627 MILFORD MILL CBI CHEM:
CI/ST/ZP: WARREN GLEN, NJ 0
PRODVOL: 185,300 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 6087528 LINE: 1 REPORT YEAR: 90
COMPANY: JAMES RIVER CORPORATION CBI COMP: N
SITE: JAMES RIVER-PEPPERELL CBI PLANT: N
ADDRESS: MAIN ST CBI CHEM:
CI/ST/ZP: PEPPERELL, MA 1463
PRODVOL: 916,137 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60809654 LINE: 1 REPORT YEAR: 90
COMPANY: JAMES RIVER CORPORATION CBI COMP: N
SITE: JAMES RIVER-CURTIS DIV CBI PLANT: N
ADDRESS: 1000 N HURON ST CBI CHEM:
CI/ST/ZP: YPSILANTI, MI 48197
PRODVOL: 68,300 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60809605 LINE: 1 REPORT YEAR: 90
COMPANY: JAMES RIVER CORPORATION CBI COMP: N
SITE: JAMES RIVER-FITCHBURG CBI PLANT: N
ADDRESS: OLD PRINCETON RD CBI CHEM:
CI/ST/ZP: FITCHBURG, MA 1410
PRODVOL: 28,000 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60818168 LINE: 1 REPORT YEAR: 90
COMPANY: JAMES RIVER CORPORATION CBI COMP: N
SITE: JAMES RIVER-CURTIS DIV/ADAMS CBI PLANT: N
ADDRESS: 115 HOLLAND AVE CBI CHEM:
CI/ST/ZP: ADAMS, MA 1220
PRODVOL: 44,172 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

U.S. ENVIRONMENTAL PROTECTION AGENCY
INFORMATION MANAGEMENT DIVISION
NONCONFIDENTIAL INFORMATION
CUS '90 CAS NUMBER REPORT

UPDFORM: 60801297 LINE: 6 REPORT YEAR: 90
COMPANY: JAMES RIVER CORPORATION CBI COMP: N
SITE: JAMES RIVER-CAMAS MILL CBI PLANT: N
ADDRESS: NE 4TH & ADAMS ST CBI CHEM:
CI/ST/ZP: CAMAS, WA 98607
PRODVOL: 3,123,242 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60849502 LINE: 4 REPORT YEAR: 90
COMPANY: JAMES RIVER GRAPHICS, INCORPORATED CBI COMP: N
SITE: JAMES RIVER-ST FRANCISVILLE CBI PLANT: N
ADDRESS: HWY 964 W OF HWY 61 CBI CHEM:
CI/ST/ZP: ST FRANCISVILLE, LA 70775
PRODVOL: 23,990,000 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60866100 LINE: 1 REPORT YEAR: 90
COMPANY: JAMES RIVER GRAPHICS, INCORPORATED CBI COMP: N
SITE: JAMES RIVER-CURTIS DIV/NEWARK CBI PLANT: N
ADDRESS: 225 PAPER MILL RD CBI CHEM:
CI/ST/ZP: NEWARK, DE 19711
PRODVOL: 57,854 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60853157 LINE: 5 REPORT YEAR: 90
COMPANY: JAMES RIVER GRAPHICS, INCORPORATED CBI COMP: N
SITE: JAMES RIVER-NAHEOLA MILL CBI PLANT: N
ADDRESS: RTE 114 CBI CHEM:
CI/ST/ZP: PENNINGTON, AL 36916
PRODVOL: 6,029,727 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60843378 LINE: 1 REPORT YEAR: 90
COMPANY: JAMES RIVER GRAPHICS, INCORPORATED CBI COMP: N
SITE: JAMES RIVER-PARCHMENT MILL CBI PLANT: N
ADDRESS: 100 ISLAND AVE CBI CHEM:
CI/ST/ZP: PARCHMENT, MI 49004
PRODVOL: 1,081,223 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 60815636 LINE: 2 REPORT YEAR: 90
COMPANY: JAMES RIVER GRAPHICS, INCORPORATED CBI COMP: N
SITE: JAMES RIVER-WAUNA MILL CBI PLANT: N
ADDRESS: RTE 2 BOX 2185 9 MI W OF CLATSKANIE ON CBI CHEM:
CI/ST/ZP: CLATSKANIE, OR 970169299
PRODVOL: 675,000 CBI: N MF/IMP: M CBI: N SITE-LIM: Y CBI: N

UPDFORM: 60823309 LINE: 1 REPORT YEAR: 90
COMPANY: JAMES RIVER GRAPHICS, INCORPORATED CBI COMP: N
SITE: JAMES RIVER-MILFORD MILL CBI PLANT: N
ADDRESS: FRENCHTOWN RD CBI CHEM:
CI/ST/ZP: MILFORD, NJ 8848
PRODVOL: 60,738 CBI: N MF/IMP: M CBI: N SITE-LIM: Y CBI: N

END OF CASNO: 61789659 TOTAL PRODUCTION: 36,946,093

CUS 1994 SUBMITTERS

U.S. ENVIRONMENTAL PROTECTION AGENCY
INFORMATION MANAGEMENT DIVISION
NONCONFIDENTIAL INFORMATION
CUS '94 CAS NUMBER REPORT

CAS NUMBER: 61789659
CHEMICAL NAME: Resin acids and Rosin acids, aluminum salts

UPDFORM: 61130209 LINE: 3 REPORT YEAR: 94
COMPANY: DAICOLOR-POPE INC CBI COMP: N
SITE: DAICOLOR-POPE INC CBI PLANT: N
ADDRESS: 33 SIXTH AVE CBI CHEM: N
CI/ST/ZP: PATERSON, NJ 07524
PRODVOL: 0 CBI: Y MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 61108619 LINE: 4 REPORT YEAR: 94
COMPANY: GAYLORD CONT MILL DIV CBI COMP: N
SITE: GAYLORD CONT BOGALUSA MILL CBI PLANT: N
ADDRESS: 4TH ST PO BOX 1060 CBI CHEM: N
CI/ST/ZP: BOGALUSA, LA 704291060
PRODVOL: 180,600 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 61134706 LINE: 7 REPORT YEAR: 94
COMPANY: JAMES RIVER PAPER CO INC CBI COMP: N
SITE: CAMAS MILL CBI PLANT: N
ADDRESS: NE 4TH & ADAMS ST CBI CHEM: N
CI/ST/ZP: CAMAS, WA 98607
PRODVOL: 1,422,600 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 61134672 LINE: 1 REPORT YEAR: 94
COMPANY: JAMES RIVER PAPER CO INC CBI COMP: N
SITE: JR PGYPSILANTI MILL CBI PLANT: N
ADDRESS: 1000 N HURON ST CBI CHEM: N
CI/ST/ZP: PGYPSILANTI, MI 48197
PRODVOL: 75,300 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 61134680 LINE: 1 REPORT YEAR: 94
COMPANY: JAMES RIVER PAPER CO INC CBI COMP: N
SITE: ADAMS MILL CBI PLANT: N
ADDRESS: 115 HOWLAND AVE CBI CHEM: N
CI/ST/ZP: ADAMS, MA 01220
PRODVOL: 16,457 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 61134730 LINE: 1 REPORT YEAR: 94
COMPANY: JAMES RIVER PAPER CO INC CBI COMP: N
SITE: CASCADE PAPER MILL CBI PLANT: N
ADDRESS: CASCADE FLATS CBI CHEM: N
CI/ST/ZP: GORHAM, NH 03581
PRODVOL: 270,000 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 61134961 LINE: 1 REPORT YEAR: 94
COMPANY: JAMES RIVER PAPER CO INC CBI COMP: N
SITE: CURTIS DIVNEWARK MILL CBI PLANT: N
ADDRESS: 22S PAPER MILL RD CBI CHEM: N
CI/ST/ZP: NEWARK, DE 19711
PRODVOL: 55,660 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

U.S. ENVIRONMENTAL PROTECTION AGENCY
INFORMATION MANAGEMENT DIVISION
NONCONFIDENTIAL INFORMATION
CUS '94 CAS NUMBER REPORT

UPDFORM: 61135000 LINE: 3 REPORT YEAR: 94
COMPANY: JAMES RIVER PAPER CO INC CBI COMP: N
SITE: ST FRANCISVILLE MILL CBI PLANT: N
ADDRESS: 2105 HWY 964 CBI CHEM: N
CI/ST/ZP: ST FRANCISVILLE, LA 70775
PRODVOL: 2,019,000 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 61135059 LINE: 1 REPORT YEAR: 94
COMPANY: JAMES RIVER PAPER CO INC CBI COMP: N
SITE: KVP CBI PLANT: N
ADDRESS: 100 ISLAND AVE CBI CHEM: N
CI/ST/ZP: PARCHMENT, MI 490041394
PRODVOL: 104,000 CBI: N MF/IMP: M CBI: N SITE-LIM: N CBI: N

UPDFORM: 61135067 LINE: 1 REPORT YEAR: 94
COMPANY: JAMES RIVER PAPER CO INC CBI COMP: N
SITE: JAMES RIVER PAPER CO INC - MILFORD PLT CBI PLANT: N
ADDRESS: 404 FRENCHTOWN RD CBI CHEM: N
CI/ST/ZP: MILFORD, NJ 088481333
PRODVOL: 211,056 CBI: N MF/IMP: M CBI: N SITE-LIM: Y CBI: N

END OF CASNO: 61789659 TOTAL PRODUCTION: 5,054,673

INFORMATION MANAGEMENT DIVISION
NONCONFIDENTIAL INFORMATION
CUS '98 CAS NUMBER REPORT

CAS NUMBER:	61789659
CHEMICAL NAME:	Resin acids and Rosin acids, aluminum salts

UPDFORM:	63002158	LINE:	1						REPORT YEAR:		98
COMPANY:	CROWN PAPER COMPANY								CBI COMP:		N
SITE:	CROWN PAPER CO - D.B.A. CROWN VANTAGE								CBI PLANT:		N
ADDRESS:	300 LAKESIDE DRIVE								CBI CHEM:		N
CI/ST/ZP:	OAKLAND, CA 94612										
PRODVOL:	62,633	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	N	CBI:	N

UPDFORM:	63013056	LINE:	1						REPORT YEAR:		98
COMPANY:	CROWN PAPER COMPANY								CBI COMP:		N
SITE:	CROWN PAPER CO - CASCADE PAPER MILL								CBI PLANT:		N
ADDRESS:	72 CASCADE FLATS								CBI CHEM:		N
CI/ST/ZP:	GORHAM, NH 03581										
PRODVOL:	512,000	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	N	CBI:	N

UPDFORM:	63031991	LINE:	1						REPORT YEAR:		98
COMPANY:	CROWN PAPER COMPANY								CBI COMP:		N
SITE:	CROWN PAPER CO - NEWARK MILL								CBI PLANT:		N
ADDRESS:	4700 DEEPWATER TERMINAL RD.								CBI CHEM:		N
CI/ST/ZP:	RICHMOND, VA 23234										
PRODVOL:	22,400	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	N	CBI:	N

UPDFORM:	63034144	LINE:	1						REPORT YEAR:		98
COMPANY:	CROWN PAPER COMPANY								CBI COMP:		N
SITE:	CROWN PAPER CO - YPSILANTI MILL								CBI PLANT:		N
ADDRESS:	1000 NORTH HURON STREET								CBI CHEM:		N
CI/ST/ZP:	YPSILANTI, MI 48197										
PRODVOL:	56,700	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	N	CBI:	N

UPDFORM:	63041131	LINE:	2						REPORT YEAR:		98
COMPANY:	CROWN PAPER COMPANY								CBI COMP:		N
SITE:	CROWN PAPER CO - ST. FRANCISVILLE MILL								CBI PLANT:		N
ADDRESS:	2105 HWY 964 PO BOX 218								CBI CHEM:		N
CI/ST/ZP:	ST. FRANCISVILLE, LA 70775										
PRODVOL:	3,778,054	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	N	CBI:	N

UPDFORM:	63015200	LINE:	1						REPORT YEAR:		98
COMPANY:	CROWN VANTAGE								CBI COMP:		N
SITE:	CROWN VANTAGE - ADAMS MILL								CBI PLANT:		N
ADDRESS:	115 HOIWLAND AVENUE								CBI CHEM:		N
CI/ST/ZP:	ADAMS, MA 01220										
PRODVOL:	25,118	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	N	CBI:	N

UPDFORM:	63032767	LINE:	1						REPORT YEAR:		98
COMPANY:	CROWN VANTAGE								CBI COMP:		N
SITE:	CROWN VANTAGE - MILFORD MILL								CBI PLANT:		N
ADDRESS:	404 FRENCHTOWN ROAD								CBI CHEM:		N
CI/ST/ZP:	MILFORD, NJ 088481333										
PRODVOL:	262,759	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	Y	CBI:	N

UPDFORM:	63012769	LINE:	5						REPORT YEAR:		98
COMPANY:	FORT JAMES								CBI COMP:		N
SITE:	CAMAS MILL								CBI PLANT:		N
ADDRESS:	N.E. 4TH AND ADAMS STREET								CBI CHEM:		N
CI/ST/ZP:	CAMAS, WA 98607										
PRODVOL:	1,067,690	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	N	CBI:	N

UPDFORM:	63030811	LINE:	3						REPORT YEAR:		98
COMPANY:	FORT JAMES, PENNINGTON, INC.								CBI COMP:		N
SITE:	FORT JAMES, PENNINGTON, INC.-NAHEOLA MILL								CBI PLANT:		N
ADDRESS:	7530 HIGHWAY 114								CBI CHEM:		N
CI/ST/ZP:	PENNINGTON, AL 36916										
PRODVOL:	221,074	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	N	CBI:	N

U.S. ENVIRONMENTAL PROTECTION AGENCY
INFORMATION MANAGEMENT DIVISION
NONCONFIDENTIAL INFORMATION
CUS '98 CAS NUMBER REPORT

CAS NUMBER:	61789659
CHEMICAL NAME:	Resin acids and Rosin acids, aluminum salts

UPDFORM:	63044143	LINE:	4						REPORT YEAR:		98
COMPANY:	GAYLORD CONTAINER CORPORATION								CBI COMP:		N
SITE:	GAYLORD CONTAINER, BOGALUSA MILL DIVISION								CBI PLANT:		N
ADDRESS:	4TH STREET P.O.BOX 1060								CBI CHEM:		N
CI/ST/ZP:	BOGALUSA, LA 704291060										
PRODVOL:	224,000	CBI:	N	MF/IMP:	M	CBI:	N	SITE-LIM:	N	CBI:	N

END OF CASNO: 61789659 TOTAL PRODUCTION: 6,232,428

Attachment 4
Letter from Daicolor-Pope Regarding
"Manufacture" of Aluminum Rosinate

DAICOLOR- POPE, INC.
33 SIXTH AVENUE
PATERSON, NJ 07524

TELEPHONE: 973-278-5170
TOLL FREE: 888-DAI-COLR
FAX: 201-279-6834

TO: Mr. Tom Berger
Keller and Heckman

DATE: November 19, 1999

FAX: (202) 434-4646

Dear Tom,

This is a followup to our earlier conversation regarding aluminum rosinate. This material was generated *in situ* in the production of a yellow pigment. After striking the pigment, rosin solution (rosin dissolved in caustic soda) was added to the pigment followed by the addition of alum. This resulted in the precipitation of aluminum rosinate on the pigment surface. This treatment improved the dispersability and transparency of the resulting pigment for use in inks. The level of use was 7% on pigment weight. As I indicated, we no longer make the particular pigment for which this treatment was used.

Sincerely,

Robert E. Turkos, Ph.D.
Director of R & D